

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

RECEIVED

Courtney Boyd  
Plaintiff

2006 OCT -4 A 9:35

Vs.

DR.DARBOUZE, et al.,  
Defendants

Case No:2:06-CV-511-WKW

MOTION FOR GOOD CAUSE

Comes Now, The Plaintiff, Courtney Boyd, moves into this Honorable Court for good cause shown, pursuant to Rule 36 R.OF.CIV.PROC. for the defendants to answer the following admission request within (30) days of receiving this motion:

- 1). The Plaintiff will like for each defendant to listed their full name and age?
- 2). The Plaintiff will like for each defendant to stated where they are married or if they are single? If you are married how long? If you were married but is now divorce, please stated how long you were married, and why you got divorce?
3. The Plaintiff will like to know if each of the defendants have any Childern? If your answer is yes, please stated how many and their age, and name.
- 4). The Plaintiff will like to know how long have each defendant has been a resident of the State of Alabama?
- 5). The Plaintiff will like to know each the defendant educational background, including any special classes they may have been in?
- 6).The Plaintiff will like to know, how long have each defendant been employed by prison health service?
- 7). The Plaintiff will like for each defendant to listed and produce a clear copy of the medical ~~license~~ <sup>records</sup> This inculde any and all special classes you may have taking?

8). The Plaintiff will like for Defendant Kay Wilson to answer this question. Did Dr.Darbouze ever tell you that he did not take the plaintiff back brace? Did the plaintiff ever write you asking you to get Dr.Darbouze to give him his back brace?

9). The Plaintiff will like for Defendant Jean Darbouze to answer this question. Did you ever tell K.Wilson that the plaintiff gave you his back brace? Is it standard for a Doctor to keep given some one medication, if he feel that there nothing wrong with his back? Do you have any medical license showing that you had an educational on how to tell if someone is having lower back pain?

10). The Plaintiff will like for Defendant Cynthia Wambles to answer this question. Did you not see the plaintiff on 6-11-06, when he was taking to the HCU by the officers and inmate on the Stretcher, because his hold lower body had gone out?

**WHEREFORE**, The Plaintiff prays that this Defendant will answer these admission request within (30) days of receiving them. Because they will be used at the hearing set by this Honorable Court.

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing upon the Defendants Counsel, by placing it into the Staton Corr.Fac.Mail Box on September 14 2006.

  
COURTNEY BOYD Plaintiff